



United States Department of the Interior

NATIONAL PARK SERVICE
Point Reyes National Seashore
Point Reyes, California 94956

IN REPLY REFER TO:

October 9, 2012

Deputy Executive Director
California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833

Re: Avoiding Invasive Plants in CALGreen

Dear Deputy Executive Director Michael L. Nearman,

Please accept our comments for the 45-day public comment period pertaining to code changes intended for the 2013 California Building Standards Code. Our comments apply to the proposed 2013 edition of the California Green Building Standards Code (CGBC), Title 24 Part 11, also known as CALGreen. Our comments are in reference to both the Residential and Non-Residential new construction and additions/alterations portions of the code.

The National Park Service alone spends millions of dollars annually to abate invasive plant encroachment into wildland areas. We strongly support the green building code and are working to ensure parks are not planting invasive plants. As you might be able to understand, it is frustrating to our efforts when nurseries are carrying the very things we spend countless ours attempting to eradicate. The California Invasive Plant Council has on-line brochures, by region, which illuminate the plants that we consider as highly invasive and should not be planted – and with alternative planting options. Alternatives to planting highly invasive plants are the easy part of the equation. Getting support within the codes to help move this along is the nexus we dearly need to make this paradigm shift from highly invasive horticulture options to less invasive and manageable options. The key is the “invasive” aspect. Most non-natives are not a problem, however a subset are game changers when it comes to managing wildland landscapes.

To effectively avoid invasive plants from becoming established or spreading in California, the building code can include a Mandatory Measure that does not allow the planting of invasive species. Though several listings of invasive plants are available, we recommend the industry-leading California Invasive Plant Inventory Database, which is hosted and maintained by the California Invasive Plant Council (CalIPC). The database is online at: www.cal-ipc.org and maintained by an organization that is over 20 years old.

We believe invasive plants should be avoided for all newly constructed landscape areas. The building code, and particularly the Green Build Standards portion of the code, is the correct place to avoid invasive plants for newly permitted projects. By making the avoidance of invasive plant species a mandatory measure, California can prevent waste, reduce herbicide use, lessen environmental degradation, and lower costs for invasive plant remediation.

Sincerely,

Bobbi A. Simpson

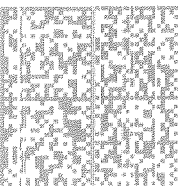


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